IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

INTELLECTUAL VENTURES I LLC,)
Plaintiff,)
v.) C.A. No. 10-1067 (LPS)
SYMANTEC CORPORATION,)
Defendant.)

MOTION FOR PATENT INVALIDITY UNDER 35 U.S.C. § 101

Defendant Symantec Corporation ("Symantec") hereby moves for judgment pursuant to Rule 52(c) that all patent claims asserted by Intellectual Ventures I LLC at trial are invalid for failure to claim patent-eligible subject matter under 35 U.S.C. § 101. The grounds for this motion are set forth in Symantec's Opening Brief, submitted herewith.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/Karen Jacobs

OF COUNSEL:

Dean G. Dunlavey Joseph H. Lee LATHAM & WATKINS LLP 650 Town Center Drive, 20th Floor Costa Mesa, CA 92626-1925 (714) 540-1235

Douglas E. Lumish
Jeffrey G. Homrig
Michelle P. Woodhouse
Brett M. Sandford
LATHAM & WATKINS LLP
140 Scott Drive
Menlo Park, CA 94025-1008
(650) 328-4600

Jack B. Blumenfeld (#1014)
Thomas C. Grimm (#1098)
Karen Jacobs (#2881)
Michael J. Flynn (#5333)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899-1347
(302) 658-9200
jblumenfeld@mnat.com
tgrimm@mnat.com
mflynn@mnat.com
kjacobs@mnat.com

Attorneys for Defendant Symantec Corporation

Neil A. Rubin Kathy Yu LATHAM & WATKINS LLP 355 South Grand Avenue Los Angeles, CA 90071-1560 (213) 485-1234

Michael J. Gerardi Robert J. Gajarsa LATHAM & WATKINS LLP 555 Eleventh Street, NW, Suite 1000 Washington, DC 20004-1304 (202) 637-1019

March 13, 2015

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered participants.

Additionally, I hereby certify that true and correct copies of the foregoing were caused to be served on March 13, 2015, upon the following individuals in the manner indicated:

Joseph J. Farnan, III Brian E. Farnan FARNAN LLP 919 N. Market Street, 12th Floor Wilmington, DE 19801 Attorneys for Plaintiff

VIA ELECTRONIC MAIL

VIA ELECTRONIC MAIL

Parker C. Folse III Brooke A.M. Taylor Lindsey N. Godfrey SUSMAN GODFREY L.L.P. 1201 Third Avenue, Suite 3800 Seattle, WA 98101-3000 Attorneys for Plaintiff

VIA ELECTRONIC MAIL

John P. Lahad
Weston O'Black
Richard W. Hess
Max L. Tribble
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, TX 77002
Attorneys for Plaintiff

/s/ Karen Jacobs
Karen Jacobs (#2881)